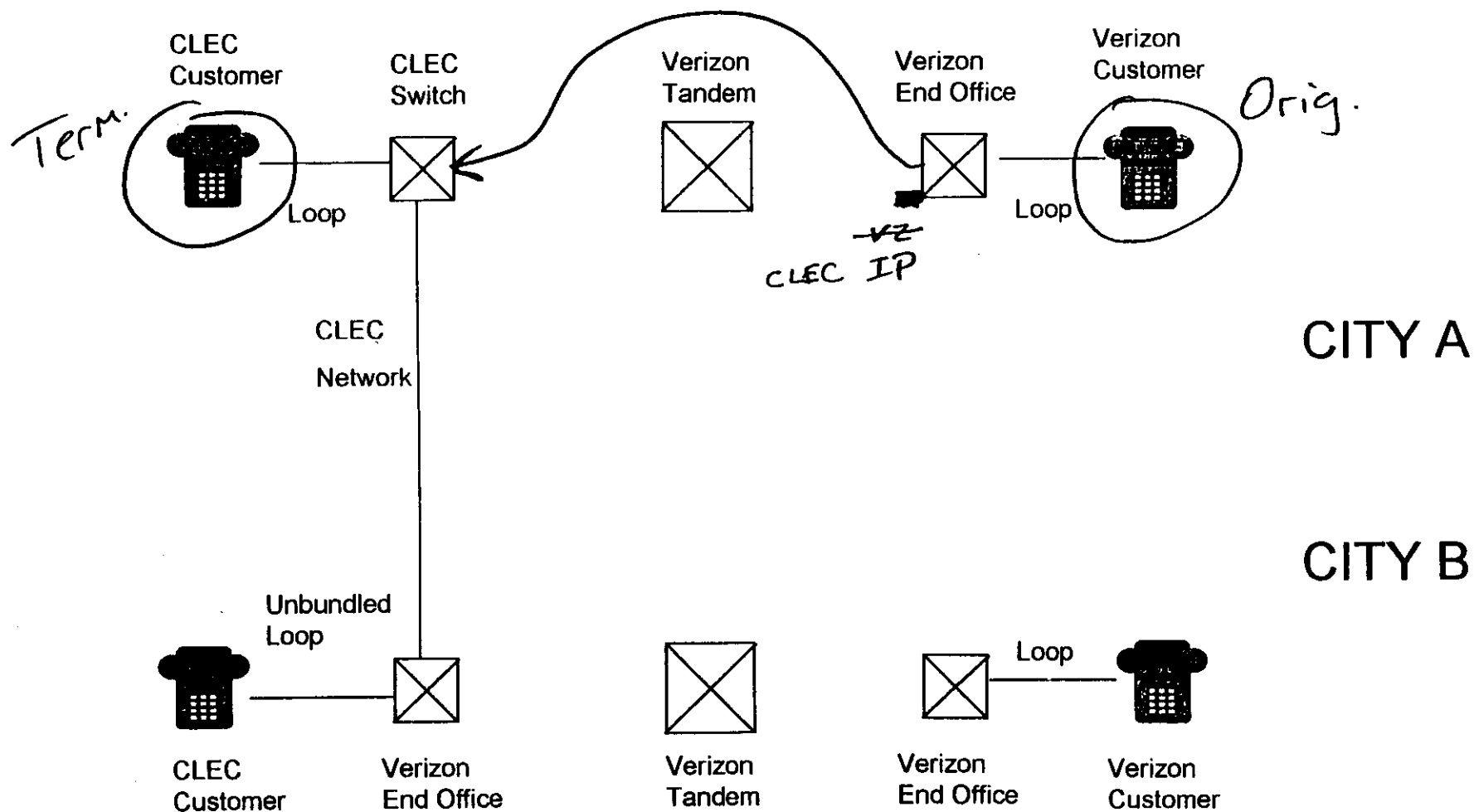


✓ Admitted

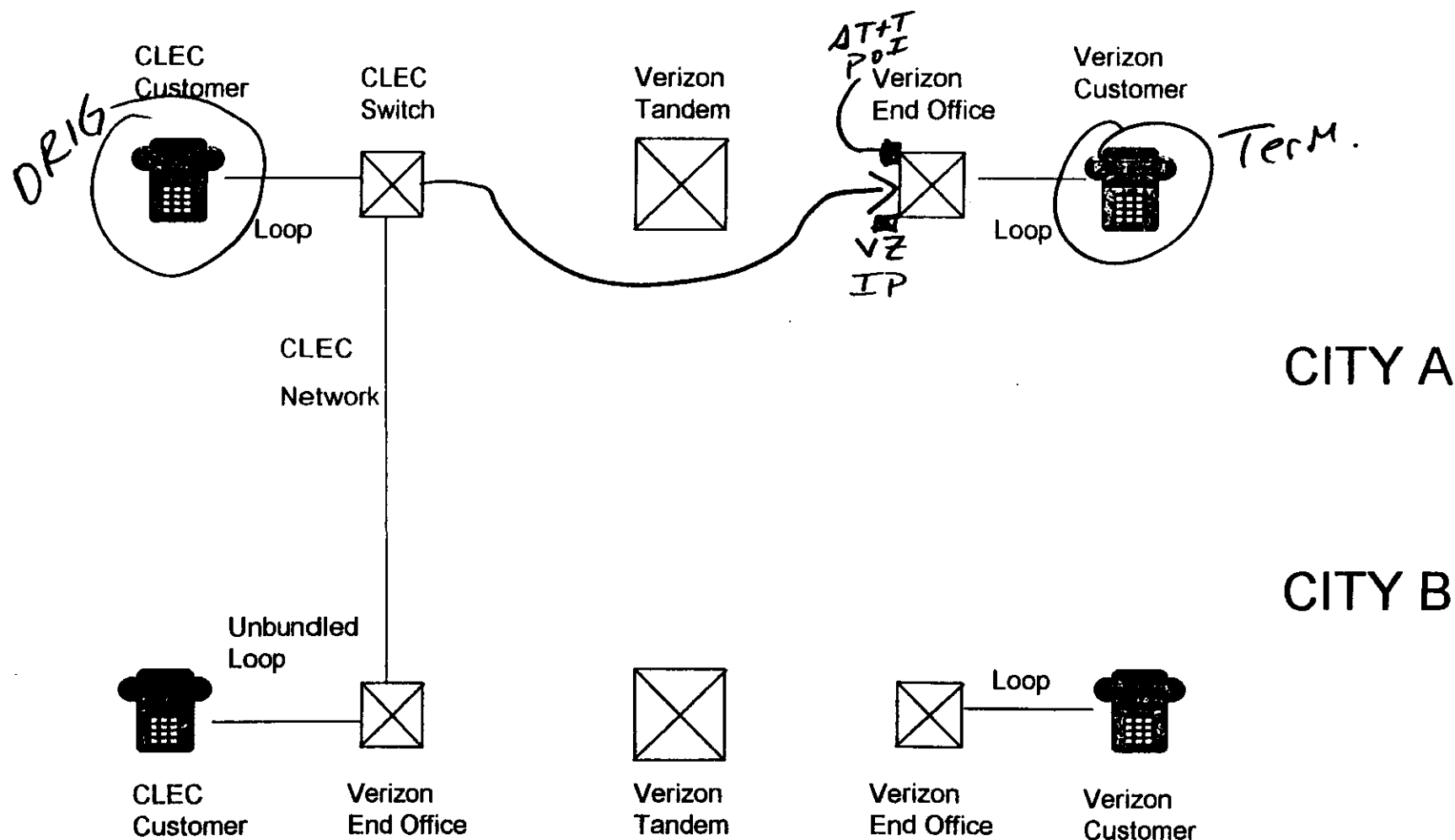
ERRATA FOR REVISED DIRECT TESTIMONY OF DAVID L. TALBOTT AND
JOHN D. SCHELL

- Page 17, footnote 23 Add "No. 5" after the first "Decision".
Delete "See Decision of Arbitration Panel, AT&T Comm'ns of
Michigan Inc. and TCG Detroit's Petition for Arbitration, Case No.
U-12465 (Oct. 18, 2000)."
- Page 30, footnote 36 Change "its IP" to "AT&T's IP".
- Page 32, line 5 Change "Verizon IP" to "AT&T IP".
- Page 38, line 10 Change "its IP is" to "AT&T's IP be".
- Page 39, line 19 Change "a Verizon IP" to "an AT&T IP".
- Page 39, line 23,24 Change "Verizon IPs" to "AT&T IPs".
- Page 67, Footnote 61 Change "at 186" to "at 191".
- Page 124, line 11 Change "POI" to "fiber optic terminal".
- Page 137, line 4 Change "Verizon-designated IP" to "ATT IP designated by
Verizon".
- Page 137, line 17 Change "Verizon's designated IP" to "an AT&T IP designated by
Verizon".
- Page 138, footnote Change "Verizon IP" to "AT&T IP".
112

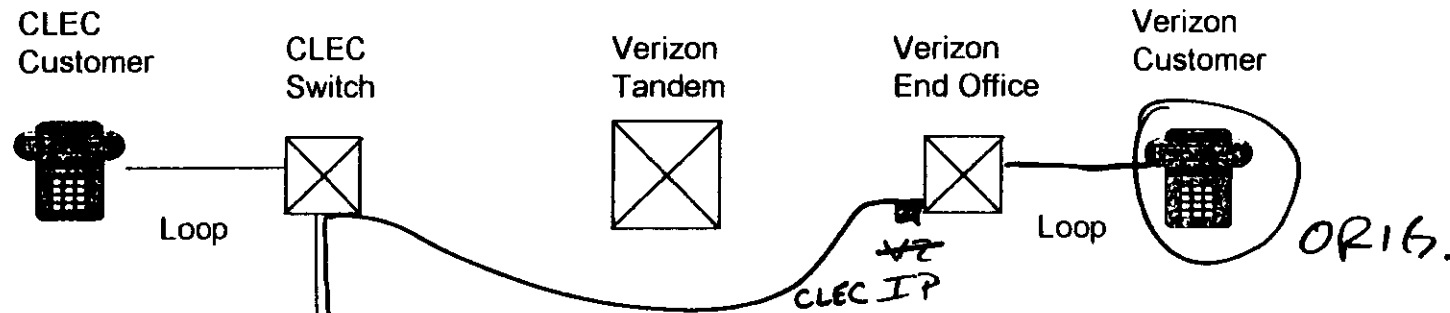
NETWORK INTERCONNECTION DISCUSSION DIAGRAMS



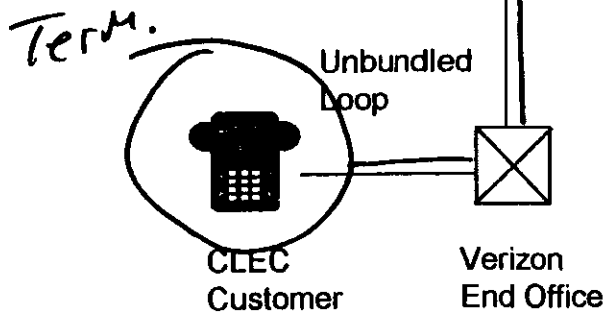
NETWORK INTERCONNECTION DISCUSSION DIAGRAMS



NETWORK INTERCONNECTION DISCUSSION DIAGRAMS

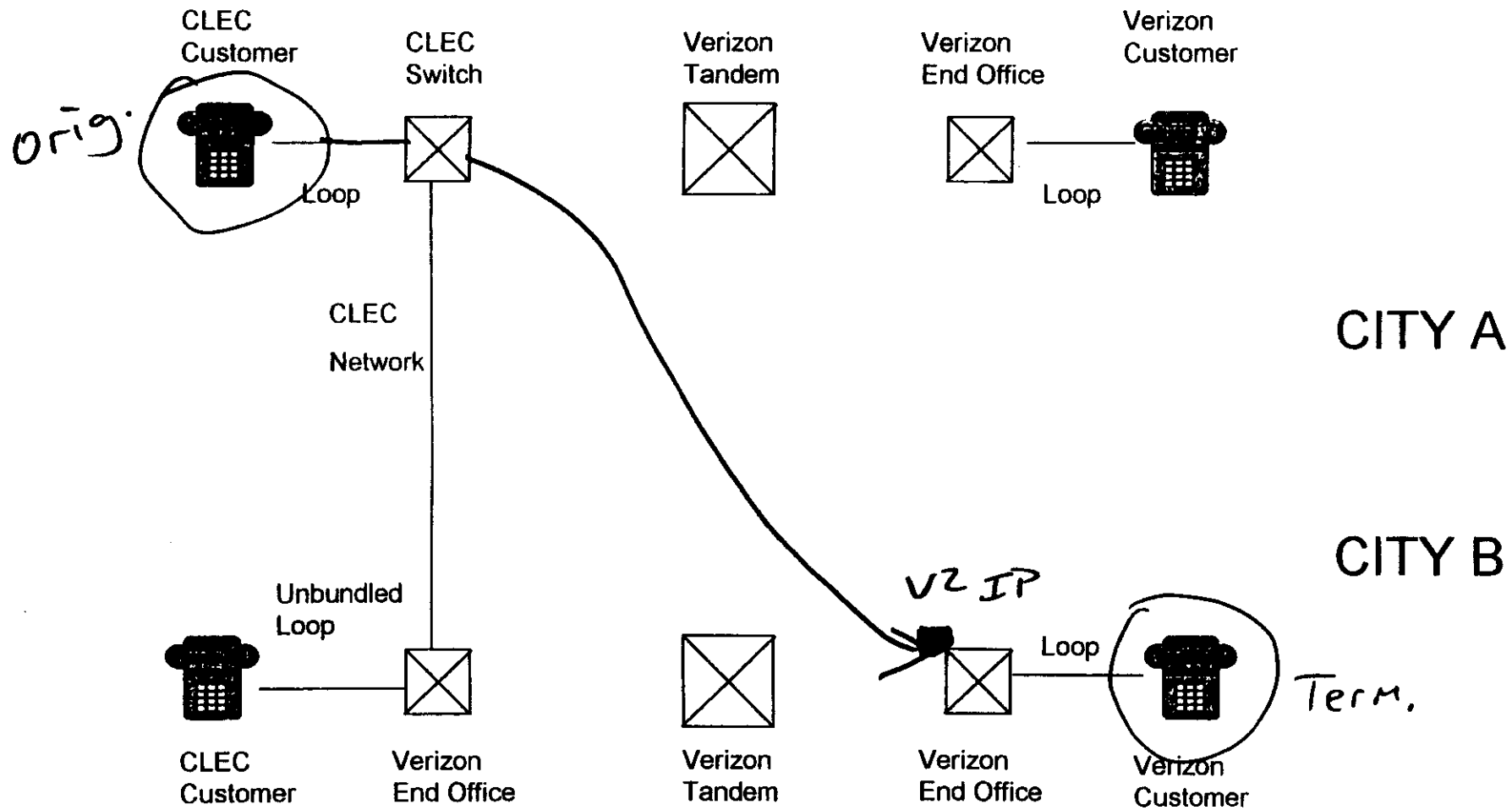


CITY A



CITY B

NETWORK INTERCONNECTION DISCUSSION DIAGRAMS



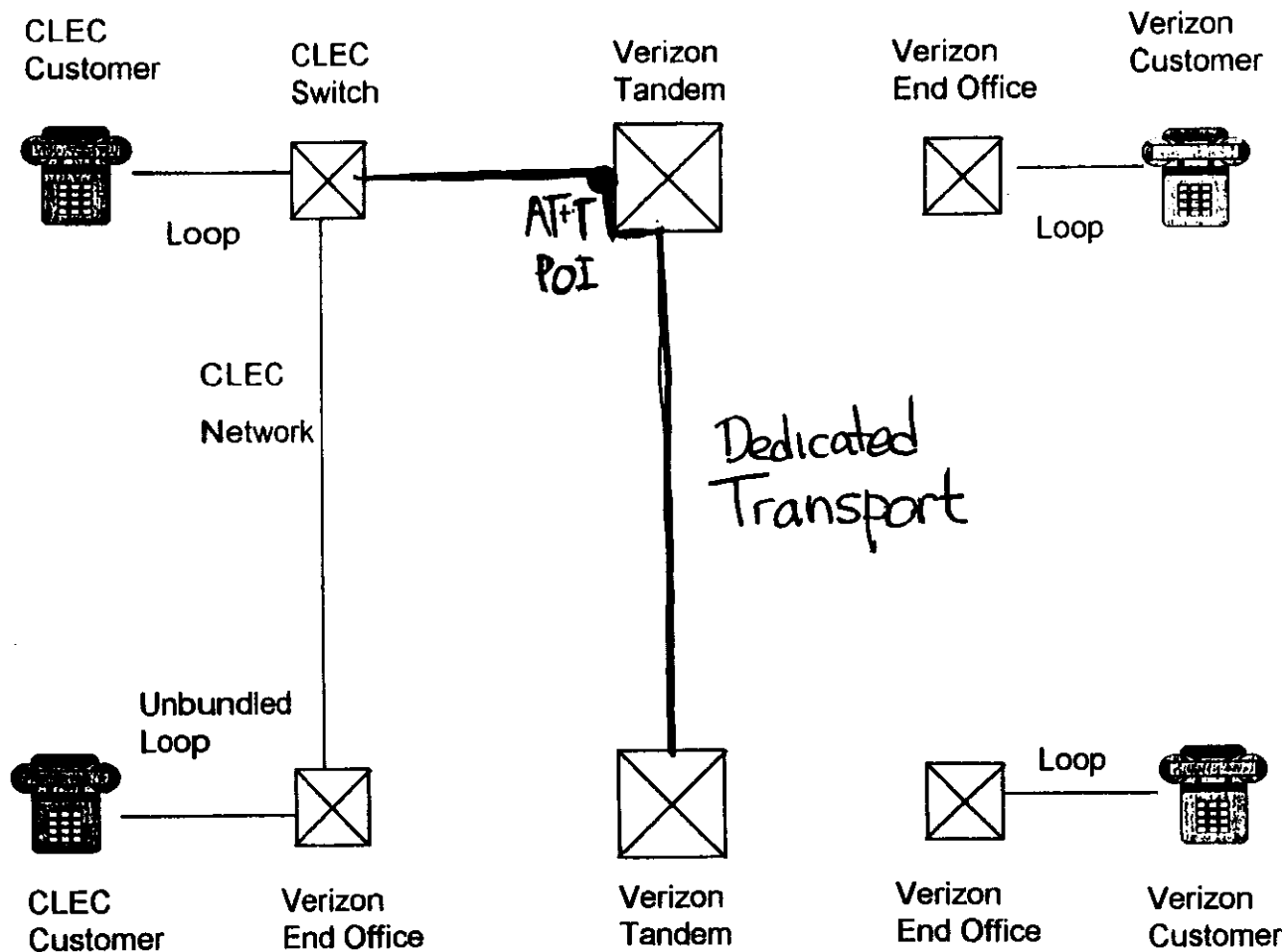
ITEM: AT&T 10-7 Please provide a copy, or alternatively identify the location in the record, of the contract provisions proposed by Verizon VA to implement the proposal described at pages 11-13 of the Direct Testimony of Donald E. Albert and Peter J. D'Amico as Verizon VA's Virtual Geographically Relevant Interconnection Point ("VGRIP").

REPLY: Subject to its previously filed objections and without waiver of same, Verizon VA states as follows:

The contract provisions that address Verizon VA's Virtual Geographically Relevant Interconnection Point ("VGRIP") proposal may be found in sections 4.1.3.2 and 4.1.3.4.

VZ VA #744

NETWORK INTERCONNECTION DISCUSSION DIAGRAMS

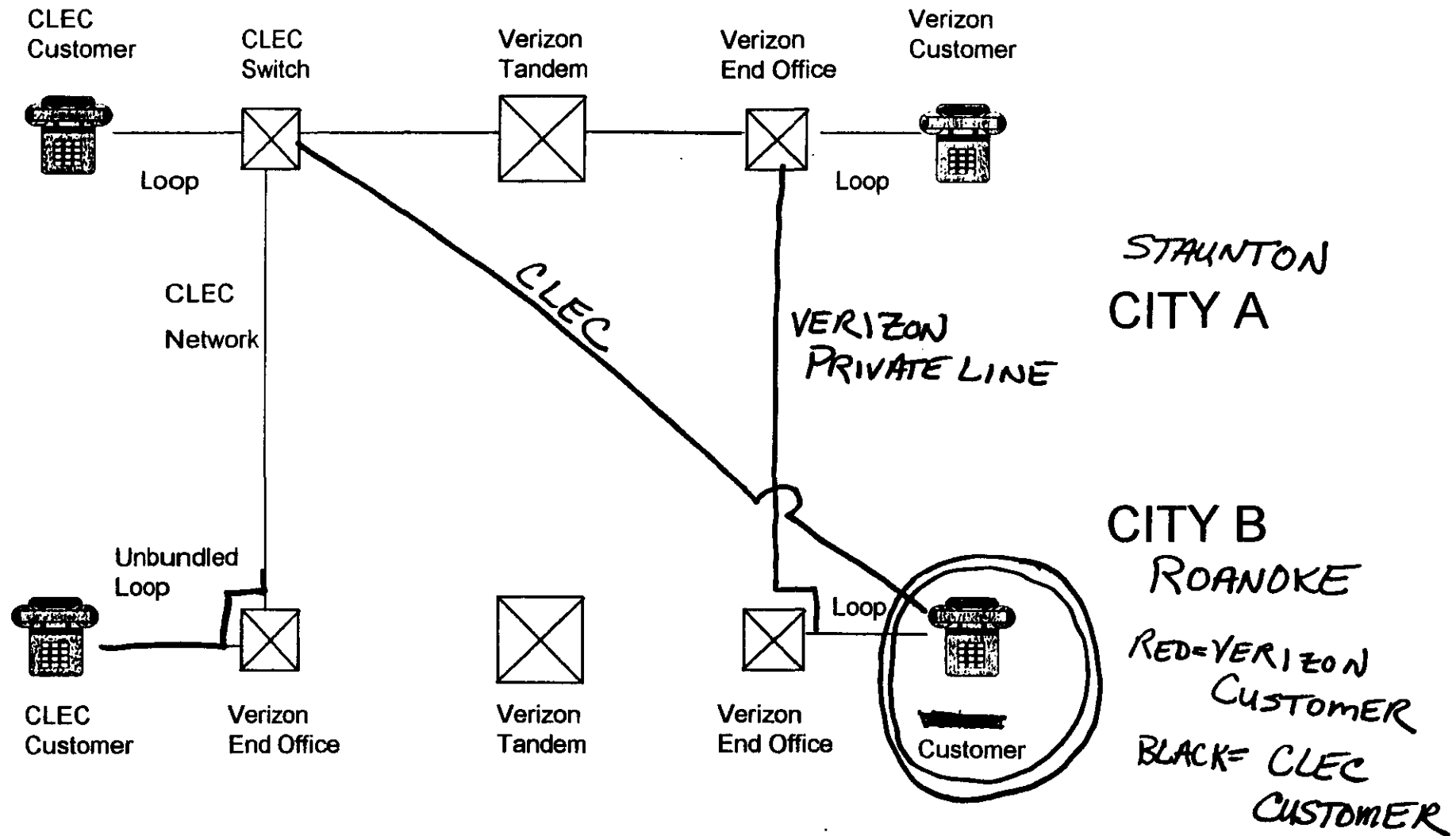


CITY A

CITY B

✓ Admitted

NETWORK INTERCONNECTION DISCUSSION DIAGRAMS



✓ Admitted

ITEM: AT&T 6-22

For each tandem in Virginia, please provide the following information:

- a. Current total trunk terminations for each tandem.
- b. Current trunks in service for each tandem.
- c. Capacity of tandem by number of trunks tandem can serve assuming each trunk is active/in service.
- d. Year by year forecasts of trunks in service for each tandem. Break down these forecasts by traffic type (Verizon traffic, IXC traffic, CLEC interconnection traffic and other) and indicate the basis for these forecasts.

REPLY:

Subject to its previously filed Objections and without waiver of same, Verizon Virginia responds as follows:

- a. See attached spreadsheet 1.
- b. See response to a.
- c. See response to a.
- d. See attached spreadsheet 2.

VZ VA #215

✓ Admitted

AT&T's Response to Record Request
CC Docket No. 00-251
October 17, 2001

Response to Record Request (10/10/2001 Tr. at 1578-79) about whether AT&T would be willing, if Verizon would provide AT&T DIXC data for both one-way and two-way trunks, to share such data with Verizon.

Answer:

Yes.

terminated the call, and keep the proceeds (See TR 550, testimony of Mr. Kirchberger).

When these two call flow compensation scenarios are both in effect, then Verizon is compensated for all of its costs, including the terminating Reciprocal Compensation charges that Ms. Preiss asked about.

This is the status quo that the New York PSC maintained and that AT&T stated it could live with in response to Ms. Preiss' question (See TR 555-556). The NYPSC stated as follows:¹

Verizon does not collect either transport or termination charges when a third-party carrier terminates local calls to an AT&T UNE-Platform customer. Instead, it keeps the reciprocal compensation it receives from the carrier that AT&T would otherwise be entitled to....With respect to an AT&T UNE-Platform customer's local calls that terminate to a third-party carrier, Verizon passes the carrier's reciprocal compensation charges, and usage charges, to AT&T for it to pay. AT&T accepts these practices and states that they have worked reasonably well.

In the New York status quo that the NYPSC maintained in its arbitration decision, Verizon in essence acts symmetrically as an agent for the 3rd party CLEC in one direction, and for AT&T in the other direction.

If, on the other hand, AT&T is required to bill the 3rd party CLEC for the terminating Reciprocal Compensation due it, as Verizon seems to want (See TR 548, testimony of Mr. Gabrielli), while at the same time Verizon collects terminating Reciprocal Compensation from AT&T for traffic in the opposite direction, then AT&T would be put in the untenable position of having to negotiate one half of an interconnection rate with the 3rd party CLEC. AT&T would be placed in the position of negotiating a rate for 3rd party CLEC calls terminating on AT&T UNE-P, but not AT&T UNE-P calls terminating on the 3rd party CLEC, which would be governed by the interconnection agreement between the 3rd party CLEC and Verizon. As AT&T argued

to the New York PSC, if the status quo were to be changed as Verizon has urged, then AT&T should be given the right to negotiate reciprocal compensation rates with 3rd party CLECs for both originating and terminating traffic transiting Verizon's network. *Id.*, at 48.

¹ New York PSC Case 01-C-0095, *Order Resolving Arbitration Issues* (July 30, 2001) at 47.



Mark A. Keffer
Chief Regulatory Counsel
Atlantic Region

RECEIVED
NOV - 8 2001
FCC MAIL ROOM

Room 3-D
3033 Chain Bridge Road
Oakton, VA 22185
703 691-6046
FAX 703 691-6093
Email Fax No. 202 263-2692
mkeffer@att.com

November 7, 2001

Magalie R. Salas, Esq.
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: CC Docket No. 00-251

*In the Matter of Petition of AT&T Communications of Virginia, Inc., Pursuant
to Section 252(e)(5) of the Communications Act, for Preemption of the Jurisdiction of the
Virginia State Corporation Commission Regarding Interconnection Disputes with
Verizon-Virginia, Inc.*

Dear Ms. Salas:

Enclosed for filing on behalf of AT&T and its affiliates, please find an original and 3 copies of AT&T's response to a record request made during the hearings on non-cost issues.

Should you have any questions, please do not hesitate to call.

Sincerely yours,

Mark A. Keffer

cc: Service List
Enclosures

cc: 3 copies rec'd OK3
FILE



Recycled Paper